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Seattle, WA 98103  
May 30, 2003

Federal Communications Commission  
445 12th Street SW  
Washington, DC 20554

**RE:** 2002 Biennial Regulatory Review -  
Review of the Commission's Broadcast Ownership  
Rules and Other Rules Adopted Pursuant to  
Section 202 of the Telecommunications Act of  
1996 (MB Docket No. 02-277); Cross-  
Ownership of Broadcast Stations and Newspapers  
(MM Docket No. 01-235); Rules and Policies  
Concerning Multiple Ownership of Radio  
Broadcast Stations in Local Markets (MM Docket  
No. 01-317); and Definition of Radio  
Markets (MM Docket No. 00-244).

Dear FCC Commissioners:

Please review these comments before taking action on the  
above proposals, and incorporate these comments into the  
public comment record.

We are dismayed that the FCC has treated the public shabbily  
in this review process. The FCC Chairman should have greatly  
broadened the discussion on this critical proposed rule by  
providing additional public meetings, expanding the FCC's  
advertisement of the rule, providing far more information  
about the proposal on the FCC's website, and offering a much  
longer public comment opportunity.

This topic should be highlighted on the FCC's website home  
page, but it is not at all obvious to the casual person  
reviewing the site that any special rulemaking is going on,  
or that the rulemaking could have huge ramifications for  
freedom of expression in the United States. Likewise, the  
FCC has been lax in advertising the proposal through the  
very media that it regulates, or in print media. We see far  
more announcements of significant public decisions to be  
made by the EPA, Department of Energy, Department of  
Defense, and other federal agencies and commissions than  
this rulemaking has had.

We are extremely concerned with the substance of the proposed rule change, namely that  
the Commission is considering to allow expanded private ownership of broadcast  
facilities in the same media market, as well as allowing much more cross-ownership of  
print media in the same media market. Together these changes would stifle public debate  
on important public policy issues, limit the ability of opposing viewpoints to present their

opinions in public forums, and further cement the control that vast media conglomerates now exert over public opinion. We do not accept the claims of the Chairman that the way our telecommunications systems have evolved in recent years make these changes necessary.

From its creation the FCC has been charged with managing the publicly-owned airwaves for the benefit of the public. The proposed rule would overturn that mandate, providing benefit to large corporate owners who are looking to further dominate the broadcast industry. The FCC is unfortunately promoting an ever-smaller number of ever-larger companies to dominate what Americans hear and see on the air. As we have seen so many times with so many industries, concentration of market share among a few companies is almost always not good for America.

Indeed, we feel that the existing rules are already too lax, allowing too much of our media markets to be controlled by large owners. The appalling instances of all radio stations in cities being owned by the same company should never have been permitted. The common situation now where two or more television stations in the same media market show the same local news program is increasingly intolerable and untenable. The rules should be changed to lower the maximum amount of a media market that is controlled by a single owner.

The FCC exists to regulate the airwaves, which are owned by the public, for the benefit of the public, not for the benefit of oligopolies. We respectfully request that the FCC return to that crucial original mission by scrapping the proposed rule and reopening the review process to much more intense public scrutiny and debate.

Sincerely yours,

Mark Lawler and Rita Race